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April 29, 2024

Via ECF

Hon. Jesse M. Furman
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: UMB Bank, N.A. v. Bristol Myers Squibb Company, No. 21 Civ. 4897 JMF

Dear Judge Furman,

We write on behalf of Plaintiff UMB Bank, N.A. (“UMB”), solely in its capacity as Trustee under the Contingent Value Rights Agreement. UMB respectfully requests leave to file under seal Exhibits 1, 2, and 4 to the Declaration of Maria Ginzburg in Support of UMB’s Supplemental Opposition to Bristol Myers Squibb Company’s Motion to Dismiss. The exhibits include information about the identity and holdings of CVR holders who are nonparties to this litigation.

Consistent with the Court’s February 5, 2024 Order, we respectfully request that the Court temporarily grant UMB’s motion to seal and “assess whether to keep the document[s] at issue sealed or redacted when resolving the underlying dispute.” ECF Nos. 78, 109. We intend to meet and confer with BMS about sealing in connection with BMS’s pending motion to dismiss.

Respectfully submitted,



Maria Ginzburg
Managing Partner